

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

May 30, 2024

United States of America
v.

Nathan Ochsner, Clerk of Court

Case No.

4:24-mj-230

Jorge Humberto DELGADO Valadez
YOB: 1983
Citizen of Mexico

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 29, 2024 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 21 U.S.C. § 841

Possession with intent to distribute a controlled substance.

Title 21 U.S.C. § 846

Conspiracy to possess with intent to distribute a controlled substance.

This criminal complaint is based on these facts:

(See Affidavit)

☒ Continued on the attached sheet.
Complainant's signature

Jacqueline Olivas, HSI Special Agent

Printed name and title

Submitted by electronic means, sworn to,
signature attested telephonically
per Fed. R. Crim. P. 4.1 and probable cause found:Date: May 30, 2024
Judge's signatureCity and state: Houston, Texas

Richard W. Bennett, U.S. Magistrate Judge

Printed name and title

4:24-mj-230

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AGAINST
JORGE HUMBERTO DELGADO VALADEZ**

May 29, 2024
Traffic Stop of Kia Sorento

On May 29, 2024, Homeland Security Investigations (“HSI”) agents were conducting surveillance in the northwest Houston area. At approximately 2:00 p.m., HSI Special Agent (“SA”) J. Olivas (“SA Olivas”) and Task Force Officer (“TFO”) B. Craig (“TFO Craig”) saw a white Kia Sorento bearing Texas license plate RXL 7807 arrive at the Express Inn Gulf Bank located at 9025 N. Freeway Frontage Rd. Houston, Texas 77037. The white Kia Sorento initially parked toward the front of the hotel, later moved towards the back, and at approximately 2:58 p.m., moved again towards the front of the hotel. Once in the front, the Kia Sorento backed up toward a white Pontiac vehicle. SA Olivas saw that the white Pontiac vehicle’s trunk was open. SA Olivas then saw a Hispanic male step out of the white Pontiac vehicle and approached the Kia Sorento. A few minutes later, the Kia Sorento left the Express Inn and the white Pontiac vehicle remained in the parking lot.

Agents followed the Kia Sorento, and with the assistance of a Houston Police Department (“HPD”) a marked unit conducted a traffic stop of the Kia Sorento for a traffic violation near Winter Bay Ln and Bisley Ln in Houston, Texas. The driver, identified as Jorge Humberto DELGADO Valadez (“DELGADO”), gave consent to search the Kia Sorento. HPD officers discovered three cardboard boxes and a duffle

bag in the back seat containing 50 bundles of a white powdery substance suspected to be cocaine. The gross weight of the bundles was approximately 50 kilograms.

SA Olivas and SA D. Reese (“SA Reese”) arrived at the traffic stop of the Kia Sorento. SA Olivas read DELGADO his Miranda rights. DELGADO waived his rights. Post Miranda, DELGADO stated that he is a mechanic; that he was test driving the Kia Sorento which he had been working on; and that he received the vehicle on or about Friday/Saturday. DELGADO did not initially provide the name of the vehicle owner, but later claimed it belonged to an individual named “Manuel”. DELGADO attempted to show us “Manuel’s” contact information in his cellphone but could not find it.¹ DELGADO stated he had noticed the cardboard boxes in the vehicle, but he did not know what was inside of them.

During the search of the Kia Sorento, agents found three (3) cellular telephones and DELGADO only claimed one (1) of the cellular cellphones as his.

The two (2) additional cellphones were found between the driver’s seat and center console. DELGADO said that he did not know who the other two (2) cellphones belonged to.

J. Olivas noticed that one of the abandoned cellphones was unlocked and contained recent messages from an unsaved phone number. The messages contained

¹ A record check showed that the Kia Sorento was registered to Lourdes Paola Rolon Martinez with an address of 6113 Clarewood Dr., Ste. D, Houston, Texas 77081.

the Express Inn information and a message in Spanish saying, “I picked up what is yours. I’m on my way over there”. The abandoned cellphone contained photographs of DELGADO and various images of single dollar bills with the serial numbers displayed. Drug trafficking organizations (“DTO”) and money laundering organizations (“MLO”) often use serialized dollar bills as a token to transfer drug proceeds for laundering purposes.

March 2024
DELGADO Delivered \$549,9890 To Undercover Agents

In the last six (6) months, in two (2) separate occasions, DELGADO delivered approximately \$549,980 in drug proceeds to HSI undercover agents. HSI agents “walked” the money, that is, sent the money to Colombia, South America to further its money laundering investigation. During the two (2) money deliveries, DELGADO drove the same white Kia Sorento.

May 9, 2024
Seizure of \$39,000

On May 9, 2024, HSI TFOs were conducting surveillance in the northwest Houston area. TFOs saw a white Kia Forte sedan bearing Colorado license plate AIKP55 meet with the same white Kia Sorento at a Whataburger restaurant located at 12424 SH 249, Houston, Texas. TFOs saw an exchange; the driver, a Hispanic male, stepped out of the Kia Sorento and handed a cardboard box to the female driver of the Kia Forte sedan. An HPD marked unit conducted a traffic stop of the Kia Forte

sedan for a traffic violation. The female driver, identified as Aurelia MADRID Marquez (“MADRID”), gave consent to search her vehicle. During the search, HPD officers found approximately \$39,000 wrapped in plastic inside of a cardboard box located in the trunk. An HPD canine alerted to the currency.

During a post-Miranda interview, MADRID admitted that she had picked up the currency from a Hispanic male driving a white Kia SUV. MADRID explained that she had picked up the money for a friend from Mexico, and that she had done several trips to Houston to pick up currency from the same Hispanic male in the white Kia SUV.



Jacqueline Olivas
Homeland Security Investigations
Special Agent

Subscribed and sworn before me via telephone on May 30, 2024 and I find probable cause.



Richard W. Bennett
UNITED STATES MAGISTRATE JUDGE